

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

J.B. INTERNATIONAL, LLC d/b/a  
J. BIRNBACH,

Plaintiff,

v.

WILLIAM NOBLE RARE JEWELS, L.P.,  
and WILLIAM NOBLE,

Defendants.

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Civil Action No. 3:22-cv-01422

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Defendants William Noble Rare Jewels, L.P. ("WNRJ") and William Noble ("Noble") (collectively, the "Defendants") hereby file this Unopposed Motion for Extension of Time to Respond to Plaintiff J.B. International, LLC d/b/a J. Birnbach's ("Plaintiff") Motion for Summary Judgment. Doc. Nos. 36-37. In support of its Motion, Defendants respectfully show the Court as follows:

On June 20, 2023, Defendants served their First Set of Requests for Production and First Set of Interrogatories to Plaintiff (the "Discovery Requests"). Pursuant to Federal Rules of Civil Procedure 33 and 34, Plaintiff's deadline to respond to the Discovery Requests was July 20, 2023. Counsel for Plaintiff committed to responding to the Discovery Requests by, most recently, August 28, 2023. But as of the date of this filing, Plaintiff has not responded.

On August 21, 2023, Plaintiff filed its Motion for Summary Judgment (the "MSJ"), seeking judgment as a matter of law on all its breach of contract claims (Counts I and II of Plaintiff's Second Amended Complaint). Doc. Nos. 36-37. Pursuant to N.D. Tex. Local Rule 7.1(e) and this

Court's Order, Doc No. 27 ¶ 8, Defendants' response to the MSJ is currently due September 11, 2023.

Defendants request an extension of twenty-one (21) days from the date Plaintiff fully responds to the Discovery Requests to respond to the Motion.

There is good cause for this extension. First, Defendants are without critical discovery responses to defend Plaintiff's allegations in this lawsuit. Second, Counsel for Defendants was set for significant hearings, depositions, and motion practice in several matters during the response period. The requested extension will provide Defendants the time, and discovery materials, necessary to substantively address and respond to the arguments within the MSJ.

This matter is set for a bench trial on January 16, 2024. This extension therefore will not cause any undue delay or prejudice. Finally, Plaintiff is unopposed to the extension of time requested herein.

Therefore, Defendants respectfully request that the Court grant this Motion and extend the deadline for Defendants to respond to the MSJ by twenty-one (21) days from the date Plaintiff fully responds to the Discovery Requests.

Dated: September 7, 2023

Respectfully Submitted,

**CRAWFORD, WISHNEW & LANG PLLC**

By: /s/ Trey Crawford  
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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on August 22, 2023, counsel for Defendants conferred with counsel for Plaintiff regarding the relief requested herein. Counsel for Plaintiff has indicated that Plaintiff is unopposed to the requested extension of time for Defendants to respond to Plaintiff's Motion for Summary Judgment.

/s/ Trey Crawford  
Trey Crawford

**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 7, 2023, a true and correct copy of the above and foregoing document was served on all parties and counsel set to receive notice via ECF and/or email service.

/s/ Trey Crawford  
Trey Crawford